

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

TRACY DEBOSE LAMPKIN,	)	
	)	
Plaintiff	)	
	)	CIVIL ACTION NO.
v.	)	1:06-CV-538-WKW
	)	
UNITED PARCEL SERVICE	)	
	)	
Defendant.	)	
_____	)	

**Request for Production of Documents and Things**

COMES NOW Tracy Lampkin, Plaintiff in the above-referenced matter and files her First Request for the Production of Documents to Emory University pursuant to Fed. R. Civ. P.26 and 34, and requests the production of the following:

**DEFINITIONS AND INSTRUCTIONS**

A. This request for production of documents shall be deemed continuing to the extent permitted by Fed. B. Civ. P.26 and 34, so as to require Defendant to serve or produce upon all parties supplemental answers or documents if Defendant or his attorneys obtain further information between the time the answers are served and the time of trial.

B. A Document whether singular or plural, means documents and other tangible things defined in the broadest sense permitted by the Federal Rules of Civil Procedure and shall include without limitations originals or, if such are not available, true copies, including copies of documents, videotapes, computer data, and sound material.

C. A Person means any natural person, corporation, partnership, association, governmental entity, agency, group, organization, etc.

D. If a requested document is no longer in your possession, custody or control, please identify the document with specificity.

E. If you object to part of a request, please identify any documents withheld. If you object to the scope or time period of the request, please answer the request for the scope or time period you believe is appropriate.

E. If you assert the attorney-client privilege or work-product exclusion as to any document requested by any of the following specific requests, please identify the document in sufficient detail to permit the Court to reach a determination in the event of a Motion to Compel.

### REQUESTS

1. Please provide all documents identified or referred to in responding to Plaintiff's First Set of Interrogatories to Defendants served on you contemporaneously herewith.
2. Please provide a copy of Plaintiff's complete personnel file including but not limited to any and all wage records, benefits, bonuses, tax, medical, leave, discipline, reprimand or counseling, evaluations and/or other documents that relate to Defendant's employment with Emory University from 2003 through 2007.
3. Please provide a copy of all performance reviews for the Plaintiff for period of 2003 through 2007.
4. With respect to Plaintiff's application for promotions please provide any and all documents including but not limited to e-mails, facsimiles, or other written correspondence utilized by the United Parcel Service staff to reach the decision to not promote.
5. Please provide a copy of the organizational chart for United Parcel Service for the period of 2003 through 2007.

6. Please provide all employee manuals that were in effect for the period of 2003 through 2007.
7. Please provide a copy of any and all grievances filed by Plaintiff for the period of 2003 through 2007.
8. Please provide a copy of any company policy or policies addressing the requirement to take a management placement test as a qualification for promotion.
9. Please provide a copy of the documentation considered in approving all applications for promotions of Tammy Nelson and Jason from 2003-2007.
10. Please provide a copy of all grievances or complaints filed against Robert Iceogle from 2003-2007.

This 10<sup>th</sup> day of July, 2007.

Respectfully submitted

/s/Crystal M. James  
Crystal M. James, Esq  
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Attorney for Plaintiff

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